

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

<b>PETER ROHLOFF,</b>	)	
	)	
<b>Complainant,</b>	)	
	)	<b>Case No. 17-1721-EL-CSS</b>
<b>v.</b>	)	
	)	
<b>THE TOLEDO EDISON COMPANY,</b>	)	
	)	
<b>Respondent.</b>	)	
	)	

**ANSWER OF THE TOLEDO EDISON COMPANY**

The Toledo Edison Company (“Toledo Edison” or “Company”) is a public utility company as defined by §4905.03(C) of the Ohio Revised Code, and is duly organized and existing under the laws of the State of Ohio. The Complaint of Peter Rohloff (“Complainant”) consists of two (2) unnumbered pages and one (1) attachment with handwritten allegations. Toledo Edison will attempt to specifically answer each allegation. To the extend Toledo Edison does not respond to a specific allegation, Toledo Edison denies any such allegation.

Therefore, in accordance with Rule 4901-9-01(D) of the Ohio Administrative Code, Respondent Toledo Edison for its answer to the complaint states:

**FIRST DEFENSE**

1. Toledo Edison admits that Complainant’s mechanical meter was replaced on or about May 28, 2017, with a standard electric meter.
2. Toledo Edison admits that Complainant contacted Toledo Edison’s call center to discuss metering issues in June 2017.
3. Toledo Edison admits that Complainant has not filed an interconnection agreement with Toledo Edison for the connection of solar panels to his residence. Further answering, Toledo

Edison avers that, as a result, Toledo Edison installed a standard electric meter and not a bi-directional meter, which would have been capable of reading both Complainant's electric usage and production.

4. Toledo Edison admits that Complainant's meter was once again replaced on or about July 6, 2017, with a bi-directional meter.

5. Toledo Edison denies that Complainant was billed for 214 kWh of electric usage for the billing period from June 21, 2017 through July 20, 2017 (bill dated July 24, 2017, and attached to the Complaint). Further answering, Toledo Edison avers that Complainant was charged for 227 kWh of electric usage from that time-period.

6. Toledo Edison states that the attachment to the Complaint speaks for itself and, therefore, no response is required. To the extent the attachment contains hand-written allegations, Toledo Edison denies any such allegations.

7. Toledo Edison denies any remaining allegations.

#### **SECOND DEFENSE**

8. The Complaint fails to set forth reasonable grounds for complaint, as required by Section 4905.26 of the Revised Code.

#### **THIRD DEFENSE**

9. The Complaint fails to state a claim upon which relief can be granted.

#### **FOURTH DEFENSE**

10. Toledo Edison at all times complied with the Ohio Revised Code Title 49; the applicable rules, regulations, and orders of the Public Utilities Commission of Ohio; and Tariff PUCO No. 8, on file with the Public Utilities Commission of Ohio. These statutes, rules, regulations, orders, and tariff provisions bar Complainant's claims.

**FIFTH DEFENSE**

11. Toledo Edison reserves the right to supplement its answer with other defenses, including affirmative defenses, as discovery progresses in this matter.

WHEREFORE, Toledo Edison requests an order dismissing the Complaint and granting Toledo Edison any other relief deemed necessary and proper.

Respectfully submitted,

/s/ Joshua R. Eckert

Joshua R. Eckert (#0095715)

Counsel of Record

Robert M. Endris (#0089886)

FirstEnergy Service Company

76 South Main Street

Akron, Ohio 44308

Telephone: 330-384-5849

Facsimile: 330-384-3875

jeckert@firstenergycorp.com

rendris@firstenergycorp.com

*On Behalf of The Toledo Edison  
Company*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Answer of The Toledo Edison Company was served upon the following by U.S. mail on this 22<sup>nd</sup> day of August, 2017.

Peter Rohloff  
16030 W. Moline – Martin Rd.  
Graytown, Ohio 43432

*/s/ Joshua R. Eckert*  
An Attorney for The Toledo Edison  
Company

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**8/22/2017 4:05:47 PM**

**in**

**Case No(s). 17-1721-EL-CSS**

Summary: Answer of The Toledo Edison Company electronically filed by Mr. Joshua R. Eckert on behalf of The Toledo Edison Company